

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
EVELYN K. RACAVITCH : CHAPTER 13
Debtor. :

SPECIALIZED LOAN SERVICING as :
servicer for Wells Fargo Bank, N.A., as :
Trustee for Park Place Securities, Inc., :
Asset-Backed Pass-Through Certificates, :
Series 2004-MCW1, Class !A-1 Certificates :
Movant, :
vs. :
EVELYN K. RACAVITCH : CASE NO. 5-18-00455
Respondents. :

DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES, Evelyn K. Racavitch, the Debtor, and files an Answer to Specialized Loan
Servicing's Motion for Relief From the Automatic Stay:

1. Evelyn K. Racavitch (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor's Counsel is in the process of contacting the Debtor to find out if payments have been made and/or if Debtor is in possession of funds needed to cure the alleged default.
4. In the event there remains an arrears, the Debtor wishes to enter into a Stipulation to include the payments in an amended Plan and/or over a six (6) month period.
5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the sale of property, the Chapter 13 Plan, and/or a six (6) month

Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: September 13, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
Scranton, PA 18504
(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 13, 2019, he caused a true and correct copy
of Debtor's Answer to Specialized Loan Servicing's Motion for Relief from the Automatic Stay to be
served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the
following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

James C. Warmbrodt, Esq. at jwarmbrodt@kmlawgroup.com

Dated: September 13, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esquire